

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

UNITED STATES DISTRICT COURT 2022 APR 14 PM 3:56  
FOR THE DISTRICT OF VERMONT

CLERK  
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SURESH MURTHY,

Plaintiff,

v.

COGNIZANT TECHNOLOGY SOLUTIONS,  
U.S. CORPORATION,

Defendant.

Civil Action No. 2:22-CV-00003-CR

**STIPULATED DISCOVERY SCHEDULE/ORDER**

The parties submit the following amended Discovery Schedule pursuant to Local Rule 26(a)(2):

**INTRODUCTION**

1. In this case, discovery may be needed on the following subjects: **All discoverable matters pursuant to F.R.C.P. 26(b)**. Unless noted here to the contrary and in more detail, discovery in this matter shall not be conducted in phases or limited to particular, enumerated issues.

2. The parties have conferred about disclosure, discovery, and preservation of electronically stored information ("ESI"). Unless noted otherwise, ESI shall be produced in the following format(s): **Readily accessible formats**.

3. The parties have conferred about claims of privilege and claims of protection as trial-preparation materials. The parties have agreed on the following procedure to assert these claims after production: **Privilege log with specificity to review claim**. Unless specifically requested in a filing with this court, the parties agreed procedure will not be the subject of a court order under Federal Rule of Evidence 502.

4. Any changes in the limitations on discovery imposed under the Federal Rules of Civil

Procedure or the Local Rules for this District shall be specifically described below.

DEADLINES

5. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before **April 29, 2022**.

6. The parties shall serve all interrogatories and requests for production on or before **May 16, 2022**.

7. Depositions of all non-expert witnesses shall be completed by **November 14, 2022**.

8. Plaintiff shall submit expert witness reports on or before **July 22, 2022**.

Depositions of plaintiff's expert witnesses shall be completed by **September 6, 2022**.

9. Defendant shall submit expert witness reports on or before **October 7, 2022**.

Depositions of defendant's expert witnesses shall be completed by **November 14, 2022**.

10. The Early Neutral Evaluation session shall be conducted on **August 9, 2022**.

The parties have agreed that **Michael Marks** will serve as the early neutral evaluator, and have scheduled the ENE session with Mr. Marks.

11. The parties shall serve all requests for admission on or before **October 11, 2022**.


12. All discovery shall be completed by **November 14, 2022** (no later than 8 months after filing of the Answer or Third-Party Answer).

13. Motions for joinder of parties and amendments to the pleadings shall be filed on or before **August 30, 2022**.

14. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before **February 1, 2023**.

15. This case shall be ready for trial by **April 15, 2023**.

RICH CASSIDY LAW

BY:   
Rich Cassidy, Esquire  
*Counsel for Plaintiff Suresh Murthy*

Date: 4/13/2022

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LITTLER MENDELSON PC

BY: /s/ Christopher B. Kaczmarek  
Christopher B. Kaczmarek, Esquire  
Ellen E. Lemire, Esq.  
*Counsel for Defendant Cognizant Technology Solutions*

Date: 4/13/2022

Littler Mendelson, P.C.  
One International Place, Suite 2700  
Boston, MA 02110

**APPROVED and SO ORDERED:**

/s/ Christina Reiss  
U.S. District Judge

Date: 4/14/2022